

## Stockport Grammar School Development and Alumni Privacy Policy

## 1. Introduction

The External Relations Department at Stockport Grammar School (SGS) keeps alumni and supporters up to date with news from the school and offers ways to engage with the School including receiving communications, attending events and donating.

The purpose of this Policy is to inform parents, former parents, school leavers, alumni, staff, former staff, donors and other supporters how their personal data is used by SGS in respect of fundraising and development. This notice also outlines what we do with your information, as well as the decisions you can make about your information in relation to fundraising and development.

If you have any questions please contact a member of the External Relations Department at <u>externalrelations@stockportgrammar.co.uk</u> or by post to The External Relations Department, Stockport Grammar School, Buxton Road, Stockport, Cheshire, United Kingdom, SK2 7AF.

### 2. Legal basis for processing

#### Legitimate Interest

We process your data as described in this policy because we have a legitimate need to do so. This means that we are using your information when this is necessary for our legitimate interests, except when your interests and fundamental rights override our legitimate interests. Our legitimate interests include:

- Ensuring that there is an active community of supporters which will benefit SGS and members of the SGS community, such as current and former pupils and parents;
- Promoting the objects and interests of SGS. This includes fundraising e.g. if we want to raise money for the bursary fund or new buildings;
- Using your personal information to administer our events;
- Safeguarding and promoting the welfare of our pupils with whom you may be in contact e.g. if you arrange work experience or mentor a pupil; and
- Ensuring that we comply with our legal obligations.

If you object to us using your information where we are relying on our legitimate interests as explained above please contact us using the information in Section 1.

#### <u>Consent</u>

In some cases, we are processing your personal information because you have given us your consent to do so. We carry out a Legitimate Interest  $Test^1$ , if

<sup>&</sup>lt;sup>1</sup> We conduct a legitimate interest test to ensure we have clear and specific benefits in mind if we rely on legitimate interests.

necessary, to ensure we are relying on legitimate interest or consent appropriately.

If we ask for your consent to use your personal information you can withdraw this consent at any time. Any use of your information before you withdraw your consent remains valid. If you wish to remove your consent please contact us on the details in Section 1. The External Relations Office looks to refresh consent every 5 years.

#### Necessary for a contract

We will need to use your information in order to perform our obligations under a contract with you, for example, we need your name and contact details so that we can send you tickets for an event that you wish to attend.

#### Legal obligation

On some occasions we will need your information to comply with a legal obligation. For example, the completion of due diligence or obligations for processing Gift Aid.

#### 3. How we collect information on you

When a pupil enters the school the External Relations Department receives and records a parent or guardians' name, email address, postal address, joining year and profession (where known). We also record a pupils' name, postal address, school email address and joining year as part of the household record.

During a parent or pupils' time at SGS we will record information on achievements, interests, special activities, university place, event attendance, donations and any volunteering.

We use third parties to collect data on our behalf to support our activities. This might include event registrations, setting up Direct Debits and processing your donations. We also, on occasion, ensure our records are as up-to-date as possible through running address and detail verification checks through sources that are deemed acceptable by the Information Commissioner's Office (ICO).

For fundraising purposes we research information in the public domain, such as contact details for local organisations to get in touch with about our latest activities and fundraising.

### 4. Analytics and Cookies

Please see the SGS Privacy Statement for how we use Cookies and Google Analytics.

#### 5. What personal data do we collect?

If you are a parent of the school we store the following information on the fundraising database when your child joins Stockport Grammar School. If you are an alumnus we will record this information during your time at school and afterwards. We also record information on other supporters who are part of our community.

• Your name and contact details

- Your contact preferences
- Your date of birth
- Gender preference
- Year at the school and leaving date
- Your family/spouse/partner details
- Your engagement with the school event attendance, volunteering, areas of interest, donating, engagement on social media channels
- Financial information needed to process gifts and tax information needed to process gift aid information
- Details of your education while at SGS and any higher education
- Your interests and activities
- Your online presence including LinkedIn, Facebook, Twitter, Instagram, business and personal websites etc.
- Your philanthropy, including gifts and pro bono support for the school
- Your relationship with other members of the School community
- Your employment and professional activities
- Financial information that is publicly available

#### 6. How we use your personal information

#### **Communications**

- To provide you with information about all areas of school life.
- To provide you with information about activities carried out by the External Relations Department. This may include networking opportunities, event invitations, volunteering opportunities.
- To ask for permission to tell your story or promote your experiences at SGS as a student or as a parent.

#### Administration

- To administrate the information that you have provided us with including educational, career and biographical information.
- To create an account for you, administration of an event, raffle or prize draw entries, or a donation.
- For internal record keeping, including the recording and monitoring of feedback or complaints.

#### Relationship Building and Fundraising

- To process information about you that you have given us or is publicly available.
- To profile, wealth screen and research in order to improve our understanding of our alumni and wider network.
- To record and monitor one off gifts, regular gifts, pledges, legacies and pro bono support.
- To transfer necessary information to HM Revenue and Customs in respect of any Gift Aid claims.

#### Monitoring and analysis

 To use IP addresses to identify your approximate location and to record website traffic.

## For statutory and regulatory compliance

 Including taking steps to adhere to money laundering or other regulatory and statutory compliance procedures.

We send communications to you by post, telephone, email or by social media depending on the contact details we hold and your communication preferences.

## 7. Research, profiling and wealth screening

We use profiling techniques to ensure communications are relevant and timely and to provide an improved experience for prospective donors. Profiling helps us to develop a better understanding of our community and prospective donors and enables us to make appropriate requests of donors and prospective donors. When building a profile we may analyse geographic, demographic and other information relating to donors and prospective donors, in order better to understand their interests and preferences.

We use research methods to ensure our engagement activity with you is appropriate as well as ensuring the information we hold about you is accurate:

- Public Sources for individual information including National change of address services, professional networks e.g., LinkedIn, any data that has been publicly made available by you (for example on a website or on social media)
- Public Sources for Companies Companies House and other businessrelated resources (free and subscription) and Company websites
- Public Sources for Charities
- Press Sources
- Property websites

We do not use third parties to wealth screen our database.

## 8. Vulnerable Circumstances

We recognise the importance of protecting our vulnerable supporters and follow the guidance issued by the Chartered Institute of Fundraising on treating donors fairly, which can be found <u>here.</u>

## 9. How we keep your personal information secure

Please see the SGS Privacy Statement for how we keep your information safe.

Although most of the information we store and process stays within the UK, some information may be transferred overseas. This may occur if, for example, one of our trusted partner's servers are located overseas. We will take steps to ensure an adequate level of protection is provided in accordance with UK data protection law.

# 10. <u>Your Choices and Rights</u>

You have a number of rights regarding your information. Your rights are as follows:

- **Rectification**: if information held about you by the School is incorrect you can ask us to correct it
- Access: you can also ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to
- **Deletion**: you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information
- **Portability**: you can request the transfer of your information to you or to a third party in a format that can be read by computer in certain circumstances
- Restriction: our use of information about you may be restricted to simply storing it in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy
- **Object:** you may object to us using your information where:
  - $\circ$   $\,$  we are using it for direct marketing purposes
  - the legal bases on which we are relying is legitimate interests. Please see the section "Our legal bases for using your information" above;
  - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of your class for historical reasons.

To exercise any of your rights you can submit your request in writing to The Director of External Relations at Stockport Grammar School, Buxton Road, Stockport SK2 7AF (or email <u>externalrelations@stockportgrammar.co.uk</u>).

### 11. <u>Retention Policy</u>

We will keep information about you for as long as we need to do so, in compliance with our data protection and other legal obligations. For example, we will need to retain contact details for you for so long as you want to be part of the school community so that we can communicate with you.

We will also need to keep a record if you tell us that you do not want to hear from us anymore, so that we do not inadvertently add you to our mailing list in the future.

We will keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School.

The School will also keep information for a long time as part of its wider legal and regulatory obligations, even if that information is no longer needed for marketing, development or fundraising purposes. This is especially relevant to former staff, pupils and parents.

## 12. Queries and Complaints

If you have any query about this Privacy Notice or believe that SGS has breached the data protection legislation, please contact The Bursar.

You also have the right to take any complaints about how we process your personal data to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (Tel: 0303 123 1113 Website: www.ico.org.uk/concerns).

## 13. Policy Amendments

We may update this privacy policy from time-to-time by posting a new version on the SGS website and, where appropriate, notifying you of the change directly.

Policy last reviewed by: Bursar & Head of Development Date of last review:01 March 2023